

**Federal Defenders  
OF NEW YORK, INC.**

Southern District  
52 Duane Street-10th Floor, New York, NY 10007  
Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton  
Executive Director

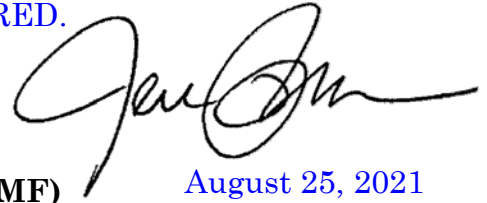
Southern District of New York  
Jennifer L. Brown  
Attorney-in-Charge

August 24, 2021

**Via ECF**

The Honorable Jesse M. Furman  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Application GRANTED on consent. The  
Clerk of Court is directed to terminate ECF  
No. 57. SO ORDERED.



**Re: *United States v. Robert Berry*, 20 CR 72 (JMF)**

August 25, 2021

Dear Judge Furman:

I write with the consent of both Pretrial Services and the government to request a modification of Mr. Berry's bail conditions to allow him to travel to the U.S. Virgin Islands for his aunt's funeral services on August 30<sup>th</sup> and 31<sup>st</sup>. Mr. Berry would like to leave New York on August 28, 2021, and return on September 7, 2021. While in the Virgin Islands, Mr. Berry will reside with his parents, Caron and Robert Berry, Sr.

Mr. Berry has been sentenced to 18 months, and has a surrender date of September 9, 2021. He will return from the Virgin Islands before his surrender date. Mr. Berry has done extremely well under the supervision of Pretrial Services, both before and after his sentencing date. Mr. Berry has maintained employment, reports regularly to his Pretrial Services officer, and has been compliant with all mandates set forth by the Court. Mr. Berry has previously traveled out of New York while under supervision, and all trips have occurred without incident. Mr. Berry's Pretrial Services officer, Ms. Dominique Jackson, has no objection to the travel and has been able to maintain contact with Mr. Berry while he was traveling.

Thank you for your consideration of this application.

Respectfully submitted,



Tamara L. Giwa  
Counsel for Mr. Berry  
(917) 890-9729

Cc: AUSA Brett Kalikow (via ECF)